

1 KAREN P. HEWITT  
United States Attorney  
2 TIMOTHY F. SALEL  
Assistant U.S. Attorney  
3 California State Bar No. 163597  
Federal Office Building  
4 880 Front Street, Room 6293  
San Diego, California 92101-8893  
5 Telephone No.: (619) 557-6074  
E-mail: [timothy.salel@usdoj.gov](mailto:timothy.salel@usdoj.gov)

6  
7 Attorneys for Plaintiff  
United States of America

8 UNITED STATES DISTRICT COURT  
9 SOUTHERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,	)	Criminal Case No. 07CR3181-DMS
	)	
11 Plaintiff,	)	
	)	JOINT MOTION TO CONTINUE DATE FOR
12 v.	)	ACCEPTANCE OF PLEA AND SENTENCING
	)	
13 ARACELI RAMIREZ-VARELA,	)	DATE: April 4, 2008
	)	TIME: 9:00 a.m.
14 Defendant.	)	
<hr/>		

15  
16 IT IS HEREBY REQUESTED by and between the parties, plaintiff, United States of  
17 America, by and through its counsel Karen P. Hewitt, United States Attorney, and Timothy F. Salel,  
18 Assistant U.S. Attorney, and Frank A. Balistreri, counsel on behalf of defendant, that the hearing  
19 for acceptance of plea and sentencing be continued from April 4, 2008 at 9:00 a.m. to June 6, 2008  
20 at 9:00 a.m. The parties agree that time shall be excluded under the Speedy Trial Act until the plea  
21 is accepted. All terms and conditions of the bond shall remain in effect and the defendant agrees to  
22 file a written acknowledgment of the next court date. The undersigned Assistant U.S. Attorney  
23 spoke with the Court's Courtroom Deputy, Jamie Klosterman, to obtain the new date, and that date  
24 is agreeable to both parties.  
25  
26  
27  
28

1 A proposed order regarding the continued date for acceptance of plea and sentencing will  
2 be submitted directly to the Court via: efile\_sabraw@casd.uscourts.gov.

3 Respectfully submitted,

4 KAREN P. HEWITT  
United States Attorney

5 DATED: March 17, 2008

6 /S/ TIMOTHY F. SALEL  
TIMOTHY F. SALEL  
Assistant U.S. Attorney

7 DATED: March 17, 2008

8 /S/ FRANK A. BALISTRERI  
FRANK A. BALISTRERI  
Attorney for Defendant

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

1	UNITED STATES OF AMERICA,	)	Case No. 07CR3181-DMS
2		)	
3	Plaintiff,	)	
4		)	
5	v.	)	CERTIFICATE OF SERVICE
6	ARACELI RAMIREZ-VARELA,	)	
7	Defendant.	)	
8	_____	)	

9 IT IS HEREBY CERTIFIED that:

10 I, Timothy F. Salel, am a citizen of the United States over the age of 18 years and a resident  
11 of San Diego County, CA; my business address is 880 Front Street, San Diego, CA 92101-8893; I  
12 am not a party to the above-entitled action.

13 I have caused service of JOINT MOTION TO CONTINUE DATE FOR ACCEPTANCE OF  
14 PLEA AND SENTENCING, on the following party, by electronically filing the foregoing with the  
15 Clerk of the District Court using its ECF System, which electronically notifies the following party:

16 Frank A. Balistreri - Attorney For Defendant at the following e-mail address:

17 [fbalistreri@cox.net](mailto:fbalistreri@cox.net)

18 I declare under penalty of perjury that the foregoing is true and correct.

19 Executed: March 17, 2008

\_\_\_\_\_  
20 */s/ TIMOTHY F. SALEL*  
TIMOTHY F. SALEL  
Assistant U.S. Attorney  
E-mail: [timothy.salel@usdoj.gov](mailto:timothy.salel@usdoj.gov)